

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>LISA BROWN, M.D.,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No. 05-32 E</b>
	)	
<b>HAMOT MEDICAL CENTER,</b>	)	
	)	
<b>Defendant.</b>	)	
	)	

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**AFFIDAVIT OF ZIAD P. HADDAD**

Ziad P. Haddad, being duly sworn, deposes and says:

1. I am an attorney admitted via *pro hac vice motion* to practice in the Commonwealth of Pennsylvania and am an attorney with the firm of Tobin, O'Connor & Ewing. Tobin, O'Connor & Ewing is serving as counsel to Defendant Hamot Medical Center ("Hamot") in the above matter and, as such, has knowledge of the facts relating to the costs of this action.

2. This affidavit is submitted in support of Hamot's request for taxation of costs pursuant to 28 U.S.C. §§ 821, 1920, 1923 and 1924.

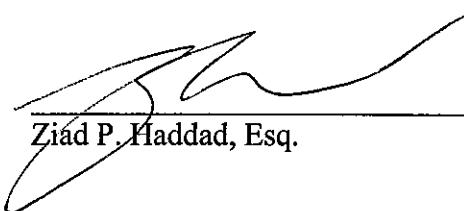
3. All the items designated as costs were necessarily incurred in this action and are permitted by law. These costs are correctly stated, as evidenced by: (1) the various summary tables (attached hereto) which show the manner in which these costs were calculated; (2) copies of invoices and/or receipts and/or accounting records attached as exhibits and; (3) by the facts sworn in this affidavit.

4. The costs of court filing fees in this case amount to \$120.00 (enumerated in Exhibit "A").

5. The costs of serving subpoenas on witnesses and medical care providers are \$808.70 (enumerated in Exhibit "B"). These costs were necessary for the case in order to obtain attendance of witnesses at deposition and obtain medical records directly relevant to plaintiff's claims.

6. The costs of deposition transcripts by the court reporters in this case (as enumerated in Exhibit "C") amount to \$2,090.75. These depositions were necessary to the development of the case at the time they were taken and the transcripts (or portions thereof) were submitted with dispositive motions to dismiss Plaintiff's claims. Accordingly, the costs therefore are recoverable. See 28 U.S.C. 1920(2).

7. The taxable fees and disbursements for printing costs (as enumerated in Exhibit "D") amount to \$1,365.18 for outside duplicating costs.



Ziad P. Haddad, Esq.

Dated:

Sworn to and subscribed before me

This 12<sup>th</sup> day of February 2008.



Cara L. Acosta  
Notary Public

CARA L. ACOSTA  
NOTARY PUBLIC DISTRICT OF COLUMBIA  
My Commission Expires October 31, 2010